

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

VIA ECF

November 14, 2024

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)
WAMY / Marks Inquiry – Response to ECF Nos 10529, 10533

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs") respectfully request until November 26, 2024 for the PECs to respond to the two items filed on behalf of counsel for WAMY (ECF Nos. 20529, 10533). In addition to opposing the substance and certain assumptions of WAMY's letter to the Court, the PECs also intend to provide the Court with additional context and guidance to examine the deposition video that counsel for WAMY has provided to the Court.

The PECs request until November 26 in part to accommodate competing deadline demands, and also to coordinate the response to the two letters that WAMY's counsel prepared over the course of more than a month.

The PECs reached out this morning to Marcus Asner and Benjamin Wolverton, retained counsel for WAMY counsel, and to Daniel Flaherty and Daniel Blinka, retained counsel for Baker Tilly, to ask for their consent to this deadline. Because we have not yet received a response, we are unable to advise the Court at this time as to whether counsel will consent to this request. Nonetheless, because we were able to reach agreement amicably regarding their previous requests for extensions, I anticipate they will reciprocate.

Respectfully submitted,

MOTLEY RICE LLC

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*Liaison Counsel of the Plaintiffs' Executive Committee for
Personal Injury and Death Claims on behalf of the Plaintiffs*

cc: The Honorable George B. Daniels, via ECF
All Counsel of Record, via ECF